

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

No. 15-CV-05345(AJN)(KHP)

**CROSSCLAIM DEFENDANT
ILYAS KHRAPUNOV'S AMENDED
RESPONSES AND OBJECTIONS TO
CROSSCLAIM PLAINTIFFS' FIRST SET
OF INTERROGATORIES TO
DEFENDANT ILYAS KHRAPUNOV**

Crossclaim Defendant Ilyas Khrapunov, by and through his attorneys in this matter, Hoguet Newman Regal & Kenney, LLP, pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure hereby responds and objects to Crossclaim Plaintiffs City of Almaty, Kazakhstan and BTA Bank JSC's ("BTA/Almaty") First Set of Interrogatories to Defendant Ilyas Khrapunov (the "Interrogatories") as follows:

GENERAL OBJECTIONS AND RESPONSES

The following General Objections are incorporated into each specific objection and response as if fully set forth in such objection and response:

1. Ilyas Khrapunov objects to the Interrogatories to the extent they are overly broad and burdensome, seek discovery that is unreasonably cumulative or duplicative, are not reasonably tailored to the issues of the case, are not reasonably calculated to lead to the discovery of admissible evidence or are not permitted by the Federal Rules of Civil Procedure,

the Local Civil Rules for the Southern and Eastern Districts of New York, or any other applicable rules.

2. In making these responses and objections, Ilyas Khrapunov is not making any incidental or implied admissions regarding the information contained in the responses. The fact that Ilyas Khrapunov has responded or objected to any Interrogatory or part thereof should not be taken as an admission that Ilyas Khrapunov accepts or admits the existence of any fact set forth or assumed by the Interrogatories, or that such response or objection constitutes admissible evidence. The fact that Ilyas Khrapunov has answered part or all of any Interrogatory is not intended and shall not be construed to be a waiver by Defendant of all or any part of any objection to any Interrogatory.

Subject to the foregoing General Objections and to the additional specific objections stated below, Ilyas Khrapunov responds to the Interrogatories as follows:

RESPONSES TO FIRST INTERROGATORIES

Interrogatory No. 1: Identify All Passports issued to You or held by You within the period of January 1, 2012, to the present. For Each Passport, state:

- The type or name of the Passport;
- The issuing government or organization;
- The date of issuance; and
- The date of expiration or the duration.

Response to Interrogatory No. 1: Ilyas Khrapunov objects to this Interrogatory on the ground that it seeks information that exceeds the scope of what is permitted by Local Civil Rule 33.3(a) and (b) and that there is a more practical method of obtaining the information sought. Ilyas Khrapunov also objects that this Interrogatory is not reasonably calculated to lead to the discovery of admissible or relevant evidence.

Subject to and without waiving these objections or any of the General Objection, Ilyas Khrapunov responds as follows:

- Republic of Kazakhstan Passport
Issued by Ministry of Justice of Kazakhstan
Issued on July 6, 2007
Expired on July 5, 2017
- St. Vincent and the Grenadines Passport
Issued on June 16, 2011
Expired on June 15, 2016
- Central African Republic Diplomatic Passport
Issued on May 21, 2012
Expired on May 20, 2017

Interrogatory No. 2: Identify All e-mail accounts used by Ilyas Khrapunov within the period of January 1, 2012, to the present. For Each e-mail account, identify:

- The e-mail address;
- When the account was opened;
- Whether the account remains active, or when the account was terminated or ceased to be used; and
- Whether the account was used for communications concerning Triadou or its parent, SDG.

Response to Interrogatory No. 2: Ilyas Khrapunov objects to this Interrogatory on the ground that it seeks information that exceeds the scope of what is permitted by Local Civil Rule 33.3(a) and (b) and that there is a more practical method of obtaining the information sought.

Subject to and without waiving these objections or any of the General Objection, Ilyas Khrapunov responds as follows:

Due to constant hacking attempts, Ilyas Khrapunov often changed his email address within the period of January 1, 2012, to the present. Mr. Khrapunov recalls using domains such as gmail.com, hotmail.com, yandex.com or .ru, rambler.ru, yahoo.com, tutanota.com, cryptoheaven.com and potentially others that he does not recall. Mr. Khrapunov also does not

recall many of the specific email accounts he used within the period of January 1, 2012, to the present.

Ilyas Khrapunov remembers using the following email accounts within the period of January 1, 2012, to the present:

- khrapunov@rambler.ru. Mr. Khrapunov does not recall the date this account was opened or closed.
- khrapunov@hotmail.com. Mr. Khrapunov does not recall the date this account was opened. This account remains active.
- ikhrapunov@sdg.ch. Mr. Khrapunov believes that he used this account in 2008, but he does not recall when he ceased using this account.
- yodamaster@cryptoheaven.com. Mr. Khrapunov does not recall the date this account was opened. This account remains active.
- obiwankonobi@tutanota.com. This account was created in the last 6 months and remains active.

Ilyas Khrapunov believes that the email accounts ik@sdg.ch and ikhrapunov@sdg.ch were used for communications concerning SDG. He does not recall whether any other accounts were used for communications concerning Triadou or its parent, SDG.

Interrogatory No. 3: Identify the period of time during which Ilyas Khrapunov used the e-mail address theuraniumguy@gmail.com.

Response to Interrogatory No. 3: Ilyas Khrapunov objects to this Interrogatory on the ground that it seeks information that exceeds the scope of what is permitted by Local Civil Rule 33.3(a) and (b) and that there is a more practical method of obtaining the information sought.

Subject to and without waiving these objections or any of the General Objection, Ilyas Khrapunov responds that he does not recall using the e-mail address theuraniumguy@gmail.com.

Dated: New York, New York
July 12, 2017

As to answers:

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.



Ilyas Khrapunov

As to Objections:



John J. Kenney
John P. Curley
Katelyn K. Brooks

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TO: Matthew L. Schwartz, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2017, a true and correct copy of Crossclaim Defendant Ilyas Khrapunov's Amended Responses and Objections to Crossclaim Plaintiffs' First Set of Interrogatories to Defendant Ilyas Khrapunov was served by electronic mail on all of the following:

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Dated: New York, New York
July 12, 2017



KATELYN K. BROOKS